

REMARKS

Claims 1-4 and 6-21 are pending in this application. Of these, 20 and 21 are new, while 1-4 and 6-19 stand rejected as being anticipated by US Published Application 2002/0026435 (Wyss et al.) under 35 USC Section 102(e). Applicant respectfully disagrees for the reasons set forth below.

Wyss et al. discloses a knowledge-base system and method for automatically processing incoming questions submitted from outside the knowledge-base system by a "client," the system generally characterized by a database of answers to frequently-asked questions. In other words, the knowledge-base system of Wyss et al. is directed toward the automated answering of discrete questions presented by a client; it does not pose questions of any number. The following statement from Wyss et al. is instructive:

"A knowledge-base system includes a processor, a database, and a matcher for matching questions of clients to answers in the database."
Abstract.

In contrast to the foregoing, the Applicant's invention as defined in each of independent claims 1, 10, and 19 is distinguishable from Wyss et al. at least in defining a computer program, system and method (respectively) for interrogating a user and generating a result (for example a report, custom video presentation, web-site presentation, etc.) based upon the user's interrogatory answers, the interrogation being effected with the presentation to the user of predefined questions from a computer database comprising such predefined questions and associated, predefined answers that are organized in a predefined relationship between a pre-designated starting question and one or more ending questions to thereby define a plurality of possible logical interrogatory paths, and wherein further the selection of any one of the plurality of possible logical paths defined by the relationship between the pre-designated starting question and the one or more ending questions is user-answer dependent. To further clarify these distinctions, Applicant has amended the independent claims to emphasize that the program/system/method of his invention provides questions to be answered by a user (Wyss et al. do not), as well as to emphasize that the plurality of possible logical paths are defined by the relationship between the pre-designated starting question and

the one or more ending questions (which Wyss et al. also necessarily lacks as a mere knowledge base for finding answers to client-generated FAQs).

Still more particularly, the invention according to an exemplary embodiment is distinguishable in that the program/system/method does not, like Wyss et al., simply patch a canned response but navigates through a logic map to ask a series of questions and gather answers that may be applied to create original combinations of words or phrases to create an original report (as opposed to the pre-written responses of Wyss et al.). In other words, it evaluates the user's answers to questions, those answers taking it down a logical path for additional inquiries and then applying rules in the "report writer" to evaluate the answers to create a customized report. For example, these answers may be applied to clinical guidelines to create a report that makes a diagnosis and presents information to the user on why the diagnosis was made.

Per another distinguishing feature, the program/system/method according to an exemplary embodiment is capable of using rules to string together video files to create a custom video presentation to the viewer/user based on the user's answers to the predefined questions. For example, the video files may match the demographics of the viewer or teach them facts they were revealed as lacking in their answers to the questions presented.

Further distinctions are manifest by a more detailed consideration of the examiner's arguments for anticipation.

Relative to each of claims 1, 10 and 19, the examiner asserts that Wyss et al. teach, at Par. 6, a plurality of predefined questions and associated, predefined answers organized in a predefined relationship between a pre-designated starting question and one or more ending questions to define a plurality of possible logical interrogatory paths. This is not, in fact, the case. Par. 6 of Wyss et al. states:

Still another form of the invention includes operating a knowledge-base system configured to store a database containing answers to questions and a number of response templates each providing a different response format. The system is operatively coupled to a client computer. An input is received from the client computer that corresponds to a question. A query result is generated from the database in response to the question from the client computer. A response message is created based on the question

from the client computer, at least one of the response templates, and the query result. The response message is sent to the client computer.

Self evidently from the foregoing, Wyss et al. comprehend receiving questions from a client rather than presenting those questions, and providing a response to those questions from the database. As such, Wyss et al. **cannot** comprehend "a plurality of possible logical interrogatory paths" as instantly claimed. At best, Wyss et al. define only a plurality of possible responses to discrete questions posited externally from "clients."

Also relative to the independent claims, the examiner contends that Wyss et al. teach the navigation of one or the plurality of possible logical interrogatory paths as dictated by the user's answers to the questions as presented at the user interface. More specifically, the examiner claims to find correspondence for this limitation in Par. 71 of Wyss et al., which refers to a "matcher":

"[T]he matcher **106** queries the database **108** in order to find Q/A entries relevant to the question. The matcher **106** uses the word index **700** from database **108** and the question-answer table **600** to generate a response."
(*Emphasis original.*)

Consistent with the overall utility and operation of the Wyss et al. invention, the foregoing and related discussion in that reference makes no reference to any navigation through any of a "plurality of possible logical interrogatory paths defined by the relationship between the pre-designated starting question and the one or more ending questions as dictated by a user's answers to the questions presented at the user interface." How could it be otherwise, inasmuch as no such "logical paths" as defined in the claims are described in Wyss et al. and, correspondingly, the system of that reference is not directed to interrogating a user, but rather to responding to "frequently asked questions" (FAQs) submitted by "clients" from outside the system? In other words, the *Wyss et al. system merely searches for an answer to a question as a simple link between FAQ and response.*

Turning to claims 2 and 11 (and claims 3 and 12 which depend, respectively, therefrom), Wyss et al likewise fail to anticipate for at least the reason that the system of that reference does not interrogate a user (and, thus, cannot teach Applicant's claimed

invention, characterized as it is by the generation of a report the content of which is dependent upon a user's answers to questions *from* the database.

Relative to claims 6 and 15 (and claims 7 and 16 which depend, respectively, therefrom), the examiner's reliance on Par. 47 of Wyss et al. is misplaced, for the teaching therein references the provision of a memory for storing the database of Q/A entries in the form of an **optical disc memory**, "such as a DVD or CDROM." This is decidedly not commensurate with teaching a database, as Applicant instantly claims, comprising one or more video files that may be displayed at the user interface, the one or more video files associated with the predefined questions and answers of the database so that the display of the one or more video files at the user interface is dependent upon a user's answers to questions from the database.

Respecting claims 8 and 17 (and claims 9 and 18 depending therefrom) the examiner's assertion that Wyss et al. teaches in Par. 48 a database comprising one or more URL addresses which may be displayed at the user interface, and which are associated with the predefined questions and answers of the database so that the display of URL addresses at the interface is user-answer dependent, is manifestly incorrect. **Wyss et al. disclose no more that that the knowledge-base system can be connected to a computer network via a web server (114).** Such a configuration has absolutely no relationship to the features recited in claims 8, 9, 17 and/or 18 of Applicant's invention.

In light of the above, Applicant respectfully submits that the rejections as to claims have been traversed. Should the examiner maintain any of the rejections of this paper, Applicant reserves the right to argue the same and/or amend the affected claims.

In view of the foregoing, Applicant submits that this case stands in condition for immediate allowance. Of course, the examiner is invited to contact Applicant's undersigned counsel at (734) 213 3435 if she should have any question respecting this paper, or if a telephone interview might otherwise expedite the prosecution of this application.

Respectfully submitted,

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